



May 29, 2018

Dale Rupp  
AK Steel Middletown  
1801 Crawford Street  
Middletown, OH 45044

**Re: AK Steel Middletown  
Notice of Violation (NOV)  
Air Permit  
Butler County  
1409010006**

**Southwest Ohio Air Quality Agency**

**Subject: Notice of Violation**

Dear Mr. Rupp:

On May 8, 2018 the Southwest Ohio Air Quality Agency (SWOAQA) conducted an on site inspection for the facility located at 1801 Crawford Street, Middletown, OH 45044. SWOAQA completed a visible emission observation for the Wilputte Underjet Coke Battery (B918). The goal of the observation was to determine the facility's compliance with Ohio's Division of Air Pollution Control's laws as found in Chapter 3704 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC) and the terms and conditions of AK Steel's Title V PTO P0105157 issued on August 10, 2017.

**Findings**

SWOAQA observed the following violations of Ohio's ORC Chapter 3704, OAC Chapter 3745, and AK Steel Corporation' permit terms and conditions. In order to bring your facility into compliance, we recommend promptly addressing this violation within 30 days of your receipt of this letter.

1. Ohio Revised Code (ORC) 3704.05(C): *"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."*

OAC rule 3745-17-07(B)(2)(d)(ii) "At no time shall there be visible fugitive particulate emissions from more than ten percent of the oven doors."

Permit terms and conditions: AK Steel Corporation, Facility ID #1409010006, Ohio EPA Title V permit number P0105157 effective October 10, 2017 for emission unit B918.

- (a) A SWOAQA inspector conducted visible particulate emissions observations in accordance with OAC rule 3745-17-03(B)(2)(c) at AK Steel Corporation on May 8, 2018 of the Wilputte Coke Battery (emissions unit B918) oven doors. It was found by SWOAQA that 22 oven doors were leaking. This is greater than the ten percent requirement from the permit and rules listed above.

(b) *Requested action:*

Within 30 days of receipt of this letter, AK Steel Corporation shall submit a compliance plan to SWOAQA which will address how the facility will address the exceedances identified above. Please include timelines with the compliance plan.

**Conclusion**

SWOAQA requests that AK Steel Corporation promptly undertake the necessary measures to return to compliance with Ohio's environmental laws and regulations. Within 30 days of receipt of this letter, please provide, to SWOAQA, the documentation requested above.

Failure to comply with Chapter 3704 of the Ohio Revised Code and rules promulgated thereunder may result in an administrative or civil penalty. If circumstances delay resolution of violations, AK Steel Corporation is requested to submit written correspondence describing the steps that will be taken by date certain to attain compliance.

Please note that the submission of any requested information to respond to this letter does not constitute waiver of SWOAQA's authority to seek administrative or civil penalties as provided in Section 3704.06 of the Ohio Revised Code.

Thank you for your time and cooperation and if you have any questions, please do not hesitate to contact me by phone at (513) 946-7738 or by e-mail at [kerri.castlen@hamilton-co.org](mailto:kerri.castlen@hamilton-co.org).

Sincerely,



Kerri Castlen  
Permits and Enforcement Assistant Section Manager

cc: John Paulian/James Kavalec, DAPC/CO  
Brian Dickens, USEPA Region V  
Chris Potts, AK Steel